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Attorney for Defendant  
MHEELAD DEZFOOLI

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,  
10 Plaintiff,  
11 v.  
12 MEEAAD DEZFOOLI,  
13 Defendant.

| 2:22-CR-142-RFB-DJA

**Defendant Meelad Dezfooli's Unopposed Motion to Extend Time to File Responses to the Government's Motions for Interlocutory Order of Sale for (1) 1829 La Calera Avenue, (2) 890 Harbor Avenue, (3) 6033 Watermelon Street, and (4) 6116 Chinook Way (ECF Nos. 132, 133, 135, 136, respectively).  
(Third Request)**

This Motion to Extend Time is the third request for such relief. (Local Rule IA 6-1 of the Local Rules of Practice for the U.S. District Court for the District of Nevada.)

17       Defendant MEELAD DEZFOOLI respectfully moves this Court for an Order  
18 extending the time for him to file his Responses to the Government's Motions for  
19 Interlocutory Order of Sale for 1829 La Calera Avenue, 890 Harbor Avenue, 6033  
20 Watermelon Street, and 6116 Chinook Way. The current deadline for all such Responses is  
21 May 17, 2024. Defendant DEZFOOLI requests an extension to and including May 24, 2024,  
22 in which to file its Responses.

23 Undersigned counsel met with Defendant DEZFOOLI, and has spoken with him  
24 further to determine what positions he wishes to take concerning these motions and other  
25 issues in this case. Nonetheless, counsel needs additional time to research potential  
26 arguments and gather supporting evidence. Defendant DEZFOOLI'S presence in pretrial  
27 custody and scheduling problems with the detention center at which he resides, have  
28 complicated effective meetings in this complex case.

Defendant DEZFOOLI is presently detained pending trial and is consequently separated from his business records and vital information necessary to oppose the Government's Motions. It is also extremely difficult to work on motion response preparation in a complex white collar business case when the client is for all practical purposes unavailable to readily assist counsel.

6 Assistant United States Attorney Hollingsworth and I communicated regarding the  
7 requested extension of time. He had no objection and agreed to it. This Unopposed Motion  
8 is not submitted solely for the purpose of delay or for any other improper purpose, but rather  
9 to enable counsel to prepare Responses which reflect the client's intentions.

10 For the foregoing reasons, Defendant DEZFOOLI requests an extension of time to  
11 and including May 24, 2024, so as to allow Defendant DEZFOOLI and his counsel the  
12 Responses he wishes to make to the motions.

DATED: May 13, 2024.

BOIES SCHILLER FLEXNER LLP

/s/ Richard J. Pocker  
**RICHARD J. POCKER, ESQ.**

**IT IS SO ORDERED:**

RICHARD F. BOULWARE  
UNITED STATES DISTRICT COURT JUDGE

DATED: 5/14/2024

## **CERTIFICATE OF SERVICE**

I certify that on this 13<sup>st</sup> day of May, 2024 service of Defendant DEZFOOLI'S Unopposed Motion to Extend Time to File Responses to the Government's Motions for Interlocutory Order of Sale for (1) 1829 La Calera Avenue, (2) 890 Harbor Avenue, (3) 6033 Watermelon Street, and (4) 6116 Chinook Way (ECF Nos. 132, 133, 135, 136, respectively). (Third Request) via the United States District Court e-filing system was made on all of the parties that have entered their appearances in this case.

/s/ Richard J. Pocker  
An employee of Boies Schiller Flexner LLP

**Karen D. Foster**

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**From:** Hollingsworth, Daniel (USANV) <Daniel.Hollingsworth@usdoj.gov>  
**Sent:** Monday, May 13, 2024 2:34 PM  
**To:** Karen D. Foster  
**Cc:** Richard Pocker; Debra Burgos  
**Subject:** RE: USA v. Dezfooli

I have no objection to this extension of time.

Thank you,

DDH.

**From:** Karen D. Foster <kdfoster@BSFLLP.com>  
**Sent:** Monday, May 13, 2024 10:26 AM  
**To:** Hollingsworth, Daniel (USANV) <DHollingsworth@usa.doj.gov>  
**Cc:** Richard Pocker <rpocker@BSFLLP.com>; Debra Burgos <dburgos@BSFLLP.com>  
**Subject:** [EXTERNAL] USA v. Dezfooli

Good morning, Dan. I called and left you a voice message earlier this morning requesting an extra week to respond to the motions seeking interlocutory orders of sale in the Dezfooli case. Attached is a proposed Unopposed Motion for purposes of effectuating such an extension.

Please advise as to the Government's position on my request, so I can determine which variety of motion for extension I must file.

Richard Pocker

**Karen D. Foster**  
Receptionist

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